

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PIERCE DUCHENE,

Plaintiff,

vs.

WESTLAKE SERVICES, LLC, d/b/a
WESTLAKE FINANCIAL SERVICES,

Defendant.

Civil Action No. 2:13-cv-1577-MRH

Hon. Mark R. Hornak,
United States District Judge

MOTION FOR ADMISSION *PRO HAC VICE* OF SETH A. SCHAEFFER

Defendant Westlake Services, LLC (“Westlake”), through its undersigned counsel, moves the Court for an Order admitting Seth A. Schaeffer to practice law before the court, *pro hac vice*, pursuant to Rule 83.2.B of the Local Rules for the United States District Court for the Western District of Pennsylvania. In support thereof, Westlake states as follows:

1. Laura A. Lange is admitted to practice before the United States District Court for the Western District of Pennsylvania. Ms. Lange is an associate with the law firm of McGuireWoods LLP, 625 Liberty Avenue, 23rd Floor, Pittsburgh, Pennsylvania 15222. Ms. Lange is counsel of record for Westlake in this action.

2. Seth A. Schaeffer is a partner in the law firm of McGuireWoods and maintains an office for the practice of law at 901 East Cary Street, Richmond, Virginia 23219. Mr. Schaeffer is admitted to practice in the State of Virginia (September 2005) and the State of New York (February 2005). Mr. Schaeffer is a member in good standing of the Bar of those states.

3. Mr. Schaeffer has never been reprimanded, suspended or disbarred, nor has he ever resigned from the practice of law. There are no grievances or disciplinary proceedings pending against him.

4. Mr. Schaeffer is fully familiar with the facts and circumstances of this litigation. He is familiar with the Local Rules of Court for the Western District of Pennsylvania. Mr. Schaeffer is a registered user of the Court's Electronic Case Filing System.

5. Westlake desires Mr. Schaeffer's representation in this matter.

6. Attached to this Motion and made a part of it is the Declaration of Mr. Schaeffer in support of this Motion.

7. Ms. Lange shall continue to serve as counsel of record in this action.

WHEREFORE, Westlake Services, LLC respectfully requests that the Court grant this Motion for Admission *Pro Hac Vice* and admit Seth A. Schaeffer to represent Westlake in this matter.

Respectfully submitted,

/s/ Laura A. Lange
Laura A. Lange (Pa. Id. No. 310733)
McGuireWoods LLP
625 Liberty Avenue, 23rd Floor
Pittsburgh, Pennsylvania 15222
(412) 667-6000 (telephone)
(412) 667-7961 (facsimile)
Email: llange@mcguirewoods.com
Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served upon the following counsel of record via notice delivered by the Court's ECF System on this 15th day of November 2013:

Jody Burton, Esq.
LEMBERG & ASSOCIATES LLC
1100 Summer Street, 3rd Floor
Stamford, Connecticut 06905
(203) 653-2250 (telephone)
(203) 653-3424 (facsimile)
Email: jburton@lemborglaw.com

/s/ Laura A. Lange